CLARK COUNTY SCHOOL DISTRICT 1 OFFICE OF THE GENERAL COUNSEL 2 CRYSTAL J. HERRERA, ESQ. Nevada Bar No. 12396 3 5100 West Sahara Avenue Las Vegas, Nevada 89146 4 Telephone: (702) 799-5373 Facsimile: (702) 799-7243 5 Herrec4@nv.ccsd.net 6 Attorney for Defendant 7 8 9

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HAZEL NIELSEN,

Plaintiff,

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CLARK COUNTY SCHOOL DISTRICT, a domestic corporation; AND DOES 1-50,

Defendants.

Case No. 2:21-cv-00727-RFB-DJA

STIPULATION AND ORDER TO EXTEND TIME FOR DEFENDANT TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT

[FIRST REQUEST]

Plaintiff Hazel Nielsen and Defendant Clark County School District, by and through their respective attorneys of record, hereby stipulate to extend the time for Defendant to file a response to Plaintiff's First Amended Complaint (ECF No. 11) from the current deadline of July 1, 2021 for eight (8) days, up to and including <u>July 9, 2021</u>. This is the first request for an extension of time to respond to Plaintiff's First Amended Complaint.

Plaintiff served Defendant with process on May 17, 2021, rendering a response due on June 7, 2021. Fed. R. Civ. P. 12. On June 7, 2021, Defendant filed a Motion to Dismiss pursuant to Fed R. Civ. P. 12(b)(6). ECF No. 8. Plaintiff subsequently filed a First Amended Complaint on June 17, 2021. ECF No. 11. Accordingly, Defendant's response to the First Amended Complaint is due July 1, 2021. Fed. R. Civ. P. 15(a)(3).

Defendant seeks an extension of time to allow sufficient time to prepare an appropriate response to the First Amended Complaint. Given the additional claims and allegations included

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1	in the First Amended Complaint, counsel requires more time to evaluate and address the same.	
2	Further, Defendant's counsel will be out of the country the week of June 28, 2021 and unable to	
3	properly prepare a response by the current responsive deadline.	
4	Based on the foregoing, the parties hereby stipulate to a short extension of time, until July	
5	9, 2021, for Defendant Clark County School District to respond to the First Amended Complaint.	
6	The short extension to answer or otherwise respond to the First Amended Complaint will have no	
7	significant or prejudicial impact on the proceedings.	
8	This request is made in good faith and not for the purpose of delay.	
9	Dated: June 28, 2021.	Dated: June 28, 2021.
10	WATKINS & LETOFSKY, LLP	CLARK COUNTY SCHOOL DISTRICT
11		OFFICE OF THE GENERAL COUNSEL
12	By: <u>/s/Michael A. DiRenzo</u> Daniel R. Watkins (#11881)	By: <u>/s/ Crystal J. Herrera</u> Crystal J. Herrera (#12396)
13	Michael A. DiRenzo (#13104) 8935 S. Pecos Rd., Ste. 22A	5100 West Sahara Avenue Las Vegas, NV 89146
14	Henderson, NV 89074	Attorney for Defendant
15	Attorneys for Plaintiff	
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17	<u>ORDER</u>	
18	IT IS SO ORDERED.	
19	DATED: <u>June 30, 2021</u> .	
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21	UNITED STATES MAGISTRATE JUDGE	
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